

Richard E. Weltman (rew@weltmosk.com)
Michael L. Moskowitz (mlm@weltmosk.com)
Michele K. Jaspan (mkj@weltmosk.com)
Adrienne Woods (aw@weltmosk.com)
WELTMAN & MOSKOWITZ, LLP
Proposed Attorneys for Debtor/Debtor-in-Possession
270 Madison Avenue, Suite 1400
New York, New York 10016-0601
(212) 684-7800

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

NUTMEG MUSIC, INCORPORATED, d/b/a
NUTMEG CREATIVE d/b/a
NUTMEG AUDIO POST d/b/a
NUTMEG POST d/b/a
NUTMEG RECORDING,

Debtor.

Case No. 18-12056 (SHL)

DECLARATION OF ATTORNEY

RICHARD E. WELTMAN, an attorney duly admitted to practice in the State of New York and before this court, of full age, declares the following to be true, pursuant to 28 U.S.C. § 1746:

1. I am an attorney and counselor-at-law duly admitted to practice in the State of New York and also in the United States District Court for the Southern District of New York.
2. Declarant is a member of the law firm of Weltman & Moskowitz, LLP (“W&M” or “Law Firm”), which maintains its principal office for the practice of law at 270 Madison Avenue, Suite 1400, New York, New York 10016-0603.
3. Neither myself nor Law Firm have any connection with Nutmeg Music, Incorporated d/b/a Nutmeg Creative (“Debtor”), the above-named Debtor, its creditors, nor any other party in interest herein, nor their respective attorneys, except that W&M will represent Debtor and debtor-in-possession in this proceeding. To the best of my knowledge, W&M is a

“disinterested person,” as such term is defined in section 101(14) of the Bankruptcy Code, as modified by section 1107(b) of the Bankruptcy Code.

4. In view of the foregoing, W&M submits it represents no interest adverse to the above-named Debtor, as debtor-in-possession, or its estate in the matters upon which Law Firm is to be engaged.

5. W&M intends to apply to the Court for allowances of compensation and reimbursement of out-of-pocket expenses incurred on or after the Petition Date in connection with this Chapter 11 case, subject to Court approval and in accordance with the applicable provisions of the Bankruptcy Code, Bankruptcy Rules, Local Rules, guidelines established by the U.S. Trustee, and further orders of this Court.

6. Law Firm’s professional legal services rendered and to be rendered in this case, in accordance with a separate engagement letter executed by Debtor on March 26, 2018, are charged at the rate of \$625 per hour for partners, and \$525 to \$395 per hour for associates and counsel. It is the customary practice of the firm to charge \$180 per hour for legal assistants and paralegals. These rates are the current rates charged by W&M and are subject to change on or after January 1, 2019 to reflect economic and other conditions.

7. W&M will maintain detailed records of actual and necessary costs and expenses incurred in connection with the legal services described above. Debtor understands that Law Firm is customarily reimbursed for all expenses incurred in connection with representation of a client in a given matter, including but not limited to, photocopying services, printing, delivery charges, filing fees, postage and electronic research.

8. Notice of this Application has been provided to (i) the Office of the United States Trustee for the Southern District of New York; (ii) Citibank, N.A., Debtor’s secured lender; (iii)

the creditors holding the largest twenty (20) unsecured claims against the Debtor's estate, as identified in the Debtor's chapter 11 petition; (iv) Debtor's secured creditors; and (v) the parties having filed a Notice of Appearance. In light of the nature of the relief requested herein and the potential harm to the Debtor's estate if the relief requested herein is not granted, Debtor respectfully submits that no other or further notice need be provided.

I declare, under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 9, 2018

/s/ Richard E. Weltman
RICHARD E. WELTMAN